

**IN THE UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF DELAWARE**

ANNE MARIE MARQUIS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 05-501-SLR
	)	
STATE OF DELAWARE,	)	
DEPARTMENT OF SERVICES FOR	)	
CHILDREN, YOUTH AND THEIR	)	
FAMILIES,	)	
	)	
Defendant.	)	

**DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

COMES NOW, the above-captioned Defendant, by and through counsel, and hereby moves this Honorable Court to enter an Order granting Summary Judgment in its favor, and against Plaintiff in this matter, pursuant to Federal Rule of Civil Procedure 56(c), for the reasons set forth in the accompanying Opening Brief in Support of Defendant's Motion for Summary Judgment.

**DEPARTMENT OF JUSTICE  
STATE OF DELAWARE**

By: /s/Stephani J. Ballard  
STEPHANI J. BALLARD, I.D. #3481  
JAMES J. MAXWELL, I.D. #2892  
Deputy Attorneys General  
Carvel State Office Building  
820 North French Street  
Wilmington, DE 19801  
(302) 577-8400  
Attorneys for Defendant

DATED: October 2, 2006

IN THE UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF DELAWARE

ANNE MARIE MARQUIS, )  
Plaintiff, )  
v. ) C.A. No. 05-501-SLR  
STATE OF DELAWARE, )  
DEPARTMENT OF SERVICES FOR )  
CHILDREN, YOUTH AND THEIR )  
FAMILIES, )  
Defendant. )

**CERTIFICATE OF MAILING AND/OR DELIVERY**

The undersigned certifies that on October 2, 2006, she caused the attached, *Defendant's Motion for Summary Judgment*, to be electronically filed with the Clerk of Court using CM/ECF which will send notification of such filing to the following:

Gary W. Aber, Esquire  
Aber, Goldlust, Baker & Over  
First Federal Plaza, Suite 600  
P.O. Box 1675  
Wilmington, DE 19899

/s/ Stephani J. Ballard  
Stephani J. Ballard, I.D. #3481  
Deputy Attorney General  
Carvel State Office Building  
820 N. French Street, 6<sup>th</sup> Floor  
Wilmington, DE 19801  
(302)577-8400  
Attorney for Defendant